

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

<b>IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	MDL No. 2875  Honorable Renée Marie Bumb
<b>THIS DOCUMENT RELATES TO:</b> <i>The Estate of Robert Lee v Zhejiang Huahai Pharmaceutical Co., Ltd., et al.</i>  <i>Case No. 1:20-cv-15324</i>	

**NOTICE OF VIDEOTAPED  
DEPOSITION OF TAMMY KITCHENS, M.D.**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure, the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 – ECF No. 632), and the Case Management Schedule for the Second Wave of Potential Personal Injury Bellwether Plaintiff Trials (filed March 12, 2025 – ECF No. 2988), Plaintiff, by and through their counsel, will take the videotaped deposition via Zoom, of **Tammy Kitchens, M.D.**, on **April 29, 2025, at 8:00 a.m. EST**, and continuing until completion, while the witness is at her home or office or other location agreed to by the parties. The videotaped deposition will be taken before a court reporter, notary public, or other person duly authorized by law to administer oaths. The deposition will be recorded by stenographic means with real-time capability. The deposition shall continue from day-to-day until completed.

All counsel of record are invited to attend. Please contact the noticing attorney or court reporter if you have not received the necessary credentials, videoconferencing links, and call-in

numbers by two calendar days prior to the deposition. Testing and support, if necessary, can be provided to you prior to the proceedings. The attorney contact for the deposition is:

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Dated: April 23, 2025

Respectfully submitted,

/s/Madeline Pendley  
Madeline Pendley  
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**CERTIFICATE OF SERVICE**

I hereby certify that on April 23, 2025, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system. I further certify that a copy of the foregoing was served on Defense counsel by email, with a copy served on all parties via MDL Centrality, on April 23, 2025.

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Dated: April 23, 2025

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Respectfully submitted,

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